

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN RE: MULTIPLAN HEALTH  
INSURANCE PROVIDER LITIGATION

This Document Relates To:

ALL ACTIONS

Case No. 1:24-cv-06795  
MDL No. 3121

Hon. Matthew F. Kennelly

**DECLARATION OF JEREMY KASHA IN SUPPORT OF PLAINTIFFS’  
MOTION TO COMPEL PRODUCTION OF DOCUMENTS CONCERNING  
MEDICAL AUDIT AND REVIEW SOLUTIONS (“MARS”)**

I, Jeremy Kasha, state under penalty of perjury that the foregoing is true and correct, and that this Declaration was made this 6th day of November 2025:

1. I am Counsel with the law firm Seeger Weiss LLP, attorneys for DAP Plaintiffs in connection with this action. I submit this Declaration in support of Plaintiffs’ concurrently filed Motion to Compel Production of Documents Concerning Medical Audit and Review Solutions (“MARS”).

2. Attached as Exhibit 1 is a true and correct copy of a ten-page slide deck titled, “2015 Client Advisory Board Meeting[.] Our New Frontier: Waste/Abuse/Fraud” produced by MultiPlan as MPI\_0000142326-335. Slide two of this presentation is dedicated to the “MARS Acquisition by MultiPlan” and states that MultiPlan now incorporates MARS “as part of normal claim/bill processing”. *Id.* at ~327

3. Attached as Exhibit 2 is a true and correct copy of an excerpt of Plaintiffs’ Third Set of Requests for Production.

4. Attached as Exhibit 3 is a true and correct copy of an excerpt of Plaintiffs’ First Set

of Requests for Production.

5. MultiPlan included the term “MARS” in its proposed search term, twice, and sent a hit report that included the term. MultiPlan now refuses to include “MARS” as a search term, apparently on the basis that MARS is a “payment integrity” service, rather than a repricing service.

6. The parties have consulted and good faith attempts were made to resolve these differences but the parties are unable to reach an accord. In emails going back at least as far as August, we have discussed MultiPlan searching for and producing documents related to MARS.

7. Plaintiffs met and conferred by video on August 14, 2025, and then again in an hour-long meeting on Monday, November 3, 2025 and, yet again, on November 5, 2025. The discussions on November 3 & 5 were led by me, as well as by Jennifer Scullion, and Audrey Siegal, also of Seeger Weiss LLP, and Steve Medlock of Vinson & Elkins for the DAPs; by Natasha Fernandez-Silber of Edelson PC for the Class; and by Sadik Huseny and Graham Haviland of Latham & Watkins LLP for defendant MultiPlan. Several other attorneys of record were also in the meeting.

8. Despite the email communications and three meet-and-confer discussions, the parties could not agree on the relevance of MARS related documents, with MultiPlan stating that they had all along “taken the position that we do not think these things are relevant”. The parties are therefore at impasse.

Executed on November 6, 2025

/s/ Jeremy R. Kasha  
Jeremy R. Kasha  
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